

July 12, 2011

Craig Whitenack, Civil Investigator
United States Environmental Protection Agency
Region IX, Southern California Field Office
600 Wilshire Avenue, Suite 1420
Los Angeles, California 90017

**Re: Yosemite Creek Superfund Site, San Francisco, CA
Owens-Illinois, Inc.'s Response to 104(e) Information Request**

This letter is a supplemental response to the United States Environmental Protection Agency's ("EPA") October 15, 2009 and August 24, 2010 requests for information ("RFI") sent to Owens-Illinois, Inc. ("Respondent") with regard to the Yosemite Creek Superfund site (the "Site"). Subject to both the general and specific objections noted below, and without waiving these or other available objections or privileges, Respondent submits the following in response to the RFI enclosed in Exhibit A.

In responding to the RFI, Respondent has undertaken a search for, and review of, documents and information in its possession, custody or control that may be relevant to this matter. However, the RFI purports to seek a great deal of information that is not relevant to the Site condition or any alleged contamination at the Site. For example, while we understand the basis of the purported connection between Respondent and the former Bay Area Drum State Superfund Site at 1212 Thomas Avenue in San Francisco, California (the "BAD Site"), certain RFI questions seek information regarding facilities other than the BAD Site, including *all* of Respondent's past and present facilities in California and *all* of Respondent's past and present facilities outside California that may have shipped drums or other containers to *any* location in within the entire state of California. These other facilities throughout California and the United States have no nexus to the Site. Because such questions are not relevant to the Site, they are beyond the scope of EPA's authority as set forth in Section 104(e)(2)(A) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") (EPA may request information "relevant to . . . [t]he identification, nature, and quantity of materials which have been . . . transported to a . . . facility").

The RFI also defined "COCs" as "any of the contaminants of concern at the Site and includes: lead, zinc, mercury, dichlorodiphenyltrichloroethane ("DDT"), chlordane, dieldrin, and polychlorinated biphenyls ("PCBs")." However, certain RFI requests also seek information regarding hazardous substances more broadly. Notwithstanding the fact that these requests go beyond the specific chemicals for which EPA purports to have evidence of a release or threatened release to the environment at the Site and therefore are not relevant to the Site pursuant to Section 104(e)(2)(A) of CERCLA; Respondent has therefore provided documents and information that may relate to the Site.

As you know, the California Department of Toxic Substances Control ("DTSC") conducted an extensive investigation of the BAD Site and Respondent's operations in connection with it. DTSC's investigation included an information request to Respondent and the DTSC files include Respondent's Response to DTSC's information request, among other documents. We understand that EPA is already in possession of DTSC's files regarding the BAD Site, and to the extent that EPA is not in possession of these files, they are readily available to EPA. Thus, the focus of Respondent's identification, review and retrieval of documents has been upon data that has not been previously provided to EPA, DTSC or any other governmental agency that is relevant to the Site. However, Respondent may produce certain information or documents in its possession, custody, or control that it previously provided to or obtained from government agencies that contain information relating to the BAD Site.

GENERAL OBJECTIONS

Respondent asserts the following general privileges, protections and objections with respect to the RFI and each information request therein.

1. Respondent asserts all privileges and protections it has in regard to the documents and other information sought by EPA, including the attorney-client privilege, the attorney work product doctrine, all privileges and protections related to materials generated in anticipation of litigation, the settlement communication protection, the confidential business information ("CBI") and trade secret protections, and any other privilege or protection available to it under law. In the event that a privileged or protected document has been inadvertently included among the documents produced in response to the RFI, Respondent asks that any such document be returned to Respondent immediately and here states for the record that it is not thereby waiving any available privilege or protection as to any such document.
2. In the event that a document containing CBI or trade secrets has been inadvertently included among the numerous documents provided in response to the RFI, Respondent asks that any such documents be returned to Respondent immediately so that Respondent may resubmit the document in accordance with the applicable requirements for the submission of Confidential Information.
3. Respondent objects to any requirement to produce documents or information already in the possession of a government agency, including but not limited to DTSC, or already in the public domain. As noted above, DTSC conducted an extensive investigation of the BAD Site and Respondent's operations in connection with it. DTSC's investigation included an information request to Respondent and the DTSC files include Respondent's Response to DTSC's information request. EPA is already in possession of DTSC's files regarding the BAD Site, and to the extent that EPA is not in possession of these files, they are readily available to EPA. Notwithstanding this objection, and without waiving it, Respondent may produce certain information or documents in its possession, custody, or control that it previously provided to or obtained from government agencies that contain information responsive to the RFI.
4. Respondent objects to Instruction 4 to the extent it seeks to require Respondent, if information responsive to the RFI is not in its possession, custody, or control, to identify any and

all persons from whom such information "may be obtained." Respondent is aware of no obligation that it has under Section 104(e) of CERCLA to identify all other persons who may have information responsive to EPA information requests and is not otherwise in a position to identify all such persons who may have such information.

5. Respondent objects to Instruction 5 on the ground that EPA has no authority to impose a continuing obligation on Respondent to supplement these responses. Respondent will, of course, comply with any lawful future requests that are within EPA's authority.

6. Respondent objects to Instruction 6 in that it purports to require Respondent to seek and collect information and documents in the possession, custody or control of individuals not within the custody or control of Respondent. EPA lacks the authority to require Respondent to seek information not in its possession, custody or control.

7. Respondent objects to the RFI's definition of "document" or "documents" in Definition 3 to the extent it extends to documents not in Respondent's possession, custody, or control. Respondent disclaims any responsibility to search for, locate, and provide EPA copies of any documents "known by Respondent to exist" but not in Respondent's possession, custody, or control.

8. Respondent objects to the RFI's definition of "Facility" or "Facilities" in Definition 4 because the terms are overbroad to the extent that they extend to facilities with no connection to either the Site or the BAD Site. Moreover, the term "Facilities" as defined in the RFI is confusing and unintelligible as the term is defined as having separate meanings in Definition 4 and Request No. 3.

9. Respondent objects to the definition of "identify" in Definition 7 to the extent that the definition encompasses home addresses of natural persons. Subject to this objection, current Respondent employees and any other natural persons are identified by name and corporate address. Respondent requests that any contacts with Respondent employees identified in these responses or the related documents be initiated through Susan L. Smith, Counsel for Respondent.

10. Respondent objects to the definition of "you," "Respondent," and "the company" in Definition 14 because the terms are overbroad and it is not possible for Respondent to answer questions on behalf of all the persons and entities identified therein. Notwithstanding this objection, and without waiving it, Respondent has undertaken a diligent and good faith effort to locate and furnish documents and information in its possession, custody, and control that are responsive to the RFI.

11. Respondent objects to EPA's requests that Respondent provide EPA separately information that is contained in documents being furnished by Respondent in response to the RFI. Where documents have been provided in connection with a response, information sought by EPA in the corresponding request for information that is set forth in those documents is not furnished separately. To do otherwise would be unduly burdensome.

RESPONSES TO OCTOBER 15, 2009 EPA INFORMATION REQUEST

1. Describe generally the nature of the business conducted by Respondent and identify the products manufactured, formulated, or prepared by Respondent throughout its history of operations.

Response No. 1:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Notwithstanding the foregoing and without waiving any of its objections, Respondent currently manufactures glass containers for the packaging of consumer goods such as foods, beverages and pharmaceuticals. Respondent's facilities which were located in California between 1940 and 1988 included plants that manufactured glass and plastic containers and plastic closures, a mold shop, sand and limestone processing plants, and other facilities that manufactured composite and corrugated containers.

2. Provide the name (or other identifier) and address of any facilities where Respondent carried out operations between 1940 and 1988 (the "Relevant Time Period") and that:
 - a. ever shipped drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal, or sale.
 - b. are/were located in California (excluding locations where ONLY clerical/office work was performed);
 - c. are/were located outside of California and shipped any drums or other containers to California for recycling, cleaning, reuse, disposal, or sale (for drums and containers that were shipped to California for sale, include in your response only transactions where the drums and containers themselves were an object of the sale, not transactions where the sole object of the sale was useful product contained in a drum or other container).

Response No. 2:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. As stated in the RFI, "EPA is seeking to identify parties that have or may have contributed to contamination at the Site." However, in addition to facilities that have a connection to the BAD Site, Request No. 2 purports to also seek information regarding *any* of Respondent's facilities located in California (excluding locations where ONLY clerical/office work was performed) and *any* of Respondent's facilities located outside of California that may have shipped drums or other containers to *any* location in California, even to locations other than the BAD Site. These other facilities have no nexus with the BAD Site, and thus this request seeks information that is not relevant to the Site.

Notwithstanding the foregoing, and without any waiver of its objections, Respondent provides the following information:

a. Respondent has been unable to locate any information or documents related to any shipments to the BAD Site for recycling, cleaning, reuse, disposal, or sale with the exception of the documents attached to this Response (Exhibit B).

b. Between 1940 and 1988, Respondent operated the following facilities located in California.

Plant No.	Location	Approximate Dates of Respondent's Operation	Type of Products Manufactured
20	Owens-Brockway Glass Container Inc. 3600 Alameda Ave. Oakland, California	1937 - Present	Glass Containers
22	Owens-Brockway Glass Container Inc. 14700 W. Schulte Road Tracy, California	1962 – Present	Glass Containers
23	Owens-Brockway Glass Container Inc. 2901 Fruitland Ave. Los Angeles, California	1927 – Present	Glass Containers
27	Owens-Brockway Glass Container Inc. 1817 G Street Oakland, California	1964 – 1989	Glass Containers
28	Owens-Brockway Glass Container Inc. 1331 East Philadelphia St. Pomona, California	1964 – 1995	Glass Containers
51	Owens-Brockway Glass Container Inc. 1400 W. 4 th St. Antioch, California	1/1997 – 5/1997	Glass Containers
52	Owens-Brockway Glass Container Inc. 22302 Hathaway Ave. Hayward, California	1997 - 2003	Glass Containers
90	Oakland GC Central Mold Shop Oakland, California	1938 – 1981	Mold Equipment for Manufacturing Glass Containers
93	Ione GCD Highway 24 Ione, California	1952 – 2000	Sand Processing
167	Owens-Brockway Plastic Products Inc. 16050 Canary Ave. LaMirada, California	1988 – 2004	Plastic Packaging Products
82	Plastic Containers 2828 East 50 th Street Los Angeles, California	1967 – 1986	Plastic Packaging Products

Plant No.	Location	Approximate Dates of Respondent's Operation	Type of Products Manufactured
	O-I PET 513 South McClure Road Modesto, California	1998 - ????	Plastic Packaging Products
	Owens-Illinois Plastic Products 2500 Huntington Dr. Fairfield, California	1977 - 1994	Plastic Packaging Products
	Corona, California	1947 - 1975	Sand Processing
	Pacific Grove, California	1947 - 1976	Sand Processing
	San Jose, California	1947 - 1987	Plastic Packaging Products
	Owens-Illinois, Inc. - Libbey Div. 200 Old Ranch Road City of Industry, California	1962 - 1992	Paper and Plastic Packaging Products
	Richmond, California - Forest Products	1965 - 1987	Fibre Packaging Products
68	Lily-Tulip 800 Iowa Ave. Riverside, California	1968 - 1981	Paper Packaging Products
83	Volcano, Limestone P.O. Box 427 Ione, California	1969 - 1994	Limestone Processing
	Owens-Illinois, Inc. - Forest Products 1570 Atlantic Street Union City, California	1969 - 1984	Fibre Packaging Products
84	Mission Viejo 31302 Ortega Highway San Juan Capistrano, California	1970 - 1984	Sand Processing
	Benicia, California	1972 - 1980	Composite Packaging Products
	San Leandro, California	1981 - ????	Printing Products
	Nekoosa Packaging 4240 Bandini Boulevard Los Angeles, California	????	Paper Packaging Products

c. Respondent has located no information or documents within its custody or control that indicate any present or past facilities located in states other than California ever shipped any drums or other containers to California for recycling, cleaning, reuse, disposal, or sale.

3. Provide a brief description of the nature of Respondent's operations at each Facility identified in your response to Question 2 (the "Facilities") including:
 - a. the date such operations commenced and concluded; and
 - b. the types of work performed at each location over time, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

Response No.3:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. In particular, but without limiting the generality of the foregoing objection, Respondent objects to the request in (b.) that it describe "types of work performed at each location over time" Without an identification by EPA of the types of work it is referring to, it would be virtually impossible, given the broad nature of possible work at various facilities, to describe each and every type of work that was performed at any facility. To the extent that EPA seeks information about facilities that have no nexus with the BAD Site, this request is not relevant to the Site.

Notwithstanding the foregoing, and without any waiver of its objections, Respondent provides the following information:

- a. **The approximate dates of Respondent's operations, to the extent the dates could be located are provided in Response to Request No. 2.**
- b. **As stated in response to Request No. 1, Respondent has operated facilities that manufactured glass and plastic containers and plastic closures, a mold shop, sand and limestone processing plants, and other facilities that manufactured composite cans and corrugated shipping containers. The table provided in response to Request No. 2 identifies the type of products manufactured at each facility.**

Glass container manufacturing facilities produce glass containers by melting raw materials such as sand, soda ash, limestone and cullet (crushed, recycled glass) in glass melting furnaces and forming the molten glass into various shaped containers in molds. The molten glass flows from the furnace through forehearths, passing through shears that cut the molten glass into "gobs" which are distributed to the mold cavities in the forming machines, where they are formed into various shaped bottles. The hot formed glass containers are coated on the surface with a tin solution and then they are re-heated in an annealing lehr and cooled gradually to relieve internal stresses in the formed glass container. The exterior surface of the cooled containers is sprayed with a coating of polyethylene to reduce abrasion of the container surfaces during handling. After the cold end surface treatment, the containers are inspected and are packaged for shipment.

The process for manufacturing plastic packaging products such as containers and closures involves the melting of various plastic resins and molding the plastic into

the desired finished shapes using compression molding, injection molding or various types of blow molding processes. The completed plastic containers and closures are packaged for shipment.

4. For each Facility, describe the types of records regarding the storage, production, purchasing, and use of Substances of Interest ("SOI") during the Relevant Time Period that still exist and the periods of time covered by each type of record.

Response No. 4:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome to the extent it seeks to require Respondent to describe "types of records." Where documents have been provided in response to this RFI, each and every document regarding SOIs is not also "identified" by describing its contents. Respondent further objects to Request No. 4 as it purports to seek information relating to hazardous substances beyond the specific chemicals for which EPA purports to have evidence of a release or threatened release to the environment at the Site and that is not relevant to the Site.

Notwithstanding the foregoing, and without any waiver of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request pertaining its facilities for the Relevant Time Period, other than the documents provided in Exhibit B and the 103(c) filings provided in Exhibit C.

5. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use, or store one of the COCs (including any substances or wastes containing the COCs) at any of the Facilities? State the factual basis for your response.

Response No. 5:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. By removing any temporal limit and any nexus between COCs at Respondent's Facilities and the BAD Site, Request No. 5 purports to seek information relating to Respondent's Facilities that is not relevant to contamination at the Site.

Notwithstanding the foregoing, and without any waiver of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request, other than the information provided in response to Request Nos. 2, 3 and 4.

6. If the answer to Question 5 is yes, identify each COC produced, purchased, used, or stored at each Facility.

Response No. 6:

Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

7. If the answer to Question 5 is yes, identify the time period during which each COC was produced, purchased, used or stored at each Facility.

Response No. 7:

Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

8. If the answer to Question 5 is yes, identify the average annual quantity of each COC produced, purchased, used, or stored at each Facility.

Response No. 8:

Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

9. If the answer to Question 5 is yes, identify the volume of each COC disposed by the Facility annually and describe the method and location of disposal.

Response No. 9:

Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

10. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use, or store hydraulic oil or transformer oil at any of the Facilities: State the factual basis for your response to this question.

Response No. 10:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. By removing any temporal limit and any nexus between hydraulic fuel or transformer oil at Respondent's Facilities and the BAD Site, Request No. 10 purports to seek information relating to Respondent's Facilities that is not relevant to contamination at the Site. Notwithstanding the foregoing, and without any waiver of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

11. If the answer to Question 10 is yes, identify each specific type of hydraulic oil and transformer oil produced, purchased, used, or stored at each Facility.

Response No. 11:

Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

12. If the answer to Question 10 is yes, identify the time period during which each type of hydraulic oil and transformer oil was produced, purchased, used, or stored.

Response No. 12:

Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

13. If the answer to Question 10 is yes, identify the average annual quantity of each type hydraulic oil and transformer oil purchased, produced, used, or stored at each Facility.

Response No. 13:

Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

14. If the answer to Question 10 is yes, identify the volume of each hydraulic oil and transformer oil disposed by the Facility annually and describe the method and location of disposal.

Response No. 14:

Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

15. Provide the following information for each SOI (SOIs include any substance or waste containing the SOI) identified in your responses to Questions 5 and 10:
- Describe briefly the purpose for which each SOI was used at the Facility. If there was more than one use, describe each use and the time period for each use;
 - Identify the supplier(s) of the SOIs and the time period during which they supplied the SOIs, and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks and other documents pertaining to the procurement of the SOI;
 - State whether the SOIs were delivered to the Facility in bulk or in closed containers, and describe any changes in the method of delivery over time;
 - Describe how, where, when, and by whom the containers used to store the SOIs (or in which the SOIs were purchased) were cleaned, removed from the Facility, and/or disposed of, and describe any changes in cleaning, removal, or disposal practices over time.

Response No. 15:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Request No. 15 purports to seek information relating to Respondent's Facilities that is not relevant to contamination at the Site. Notwithstanding the foregoing, and without any waiver of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

16. For each SOI delivered to the Facilities in closed containers, describe the containers, including but not limited to:
- a. the type of container (e.g. 55 gal. drum, tote, etc.);
 - b. whether the containers were new or used; and
 - c. if the containers were used, a description of the prior use of the container.

Response No. 16:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Request No. 16 purports to seek information relating to Respondent's Facilities that is not relevant to contamination at the Site. Notwithstanding the foregoing, and without any waiver of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

17. For each container that Respondent used to store a SOI or in which SOIs were purchased ("Substance-Holding Containers" or "SHCs") that was later removed from the Facility, provide a complete description of where the SHCs were sent and the circumstances under which the SHCs were removed from the Facility. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Response No. 17:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Respondent further objects to Request No. 17 as it assumes that each SHC is somehow individually identified, tracked, and used and reused by the same entity throughout the life of the SHC. There is no evidence that BAD operated in this way or that it tracked SHCs for its customers such that this information is available. Generally, SHCs, such as drums sent to drum reconditioners by a customer, are fungible commodities and are not individually tagged or tracked to ensure their return to that particular customer. Accordingly, Request No. 17 purports to seek information that does not exist.

Respondent further objects to Request No. 17 as it purports to seek information relating to hazardous substances beyond the specific chemicals for which EPA purports to have evidence of a release or threatened release to the environment at the Site and that is not relevant to the Site; thus Respondent has limited its review of documents and information to the COCs identified by EPA.

Additionally, as stated in the RFI, “EPA is seeking to identify parties that have or may have contributed to contamination at the Site.” However, Request No. 17 purports to seek information regarding SHCs that were sent to sites other than the BAD Site. To the extent that EPA seeks information about facilities that have no nexus with the BAD Site, this request is not relevant to the Site. Notwithstanding the foregoing, and without any waiver of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

18. For each SHC that was removed from the Facility, describe Respondent’s contracts, agreements, or other arrangements under which SHCs were removed from the Facility, and identify all parties to each contract, agreement, or other arrangement described. Distinguish between the Relevant Time Period and the time period since 1988.

Response No. 18:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. As stated in the RFI, “EPA is seeking to identify parties that have or may have contributed to contamination at the Site.” However, Request No. 18 purports to seek information regarding SHCs that were sent to sites other than the BAD Site. To the extent that EPA seeks information about facilities that have no nexus with the BAD Site, this request is not relevant to the Site. Notwithstanding the foregoing, and without any waiver of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request.

19. For each SHC, provide a complete explanation regarding the ownership of the SHC prior to delivery, while onsite, and after it was removed from the Facility. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent’s practices over time.

Response No. 19:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Respondent further objects to Request No. 19 as it assumes that each SHC is somehow individually identified, tracked, and used and reused by the same entity throughout the life of the SHC. There is no evidence that BAD operated in this way or that it tracked SHCs for its customers such that this

information is available. Generally, SHCs, such as drums sent to drum reconditioners by a customer, are fungible commodities and are not individually tagged or tracked to ensure their return to that particular customer. Accordingly, Request No. 19 purports to seek information that does not exist. As stated in the RFI, "EPA is seeking to identify parties that have or may have contributed to contamination at the Site." However, Request No. 19 purports to seek information regarding SHCs that were sent to sites other than the BAD Site. Notwithstanding the foregoing, and without any waiver of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request.

20. Identify all individuals who currently have, and those who have had, responsibility for procurement of Materials at the Facilities. Also provide each individual's job title, duties, dates performing those duties, current position or the date of the individual's resignation, and the nature of the information possessed by each individual concerning Respondent's procurement of Materials.

Response No. 20:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Request No. 20 purports to seek information relating to Respondent's Facilities that is not relevant to contamination at the Site. Respondent further objects to Request No. 20 as it purports to seek information regarding procurement of "Materials" at facilities other than the BAD Site and thus goes beyond the specific chemicals for which EPA purports to have evidence of a release or threatened release to the environment. Notwithstanding the foregoing, and without any waiver of its objections, Respondent identifies the following individuals and the approximate dates for which they may have had some responsibility for procurement.

Tracy, CA

Gordon Chambliss, Plant Cost Control/Comptroller (6/1/1965 – 6/30/1997)

Dan McKenzie, Purchasing Agent (2/1/1979 – 7/1/1993)

Don Lowe, Administrative Manager (2/16/1955 – 11/1986)

Barbara Dunkle, Buyer/Clerk (5/15/1973 – 7/1/1998)

Oakland, CA

Stanley Slowe, Purchasing Agent (4/21/1938 – 5/31/1974)

Gary Coleman, Account Executive (7/1/1964 – 12/31/1995)

Michael Perreira, Purchasing Manager – Energy (1/26/1970 – 1/9/1998)

Kathleen Allen, Assistant Purchasing Agent (6/17/1968 – Present)

Patti Nielsen, Materials Manager (6/16/1974 – 6/15/1999)

Vernon, CA

Robert Shull, (5/2/1933 – 1/31/1977)

Robert Raskin, (6/16/1963 – 5/30/1997)

21. Describe how each type of waste containing any SOIs was collected and stored at the Facilities prior to disposal/recycling/sale/transport, including:
- the type of container in which each type of waste was placed/stored;
 - how frequently each type of waste was removed from the Facility;

Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Response No. 21:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. As stated in the RFI, "EPA is seeking to identify parties that have or may have contributed to contamination at the Site." However, Request No. 21 purports to seek information regarding collection and storage of "any SOIs" at facilities other than the BAD Site. To the extent that EPA seeks information about facilities that have no nexus with the BAD Site, this request is not relevant to the Site. Notwithstanding the foregoing, and without any waiver of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

22. Describe the containers used to remove each type of waste containing any SOIs from the Facilities, including but not limited to:
- the type of container (e.g. 55 gal. drum, dumpster, etc.);
 - the colors of the containers;
 - any distinctive stripes or other markings on those containers;
 - any labels or writing on those containers (including the content of those labels);
 - whether those containers were new or used; and
 - if those containers were used, a description of the prior use of the container;

Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Response No. 22:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Respondent further objects to Request No. 22 as it assumes that each SHC is somehow individually identified, tracked, and used and reused by the same entity throughout the life of the SHC. There is no evidence that BAD operated in this way or that it tracked SHCs for its customers such that this information is available. Generally, SHCs, such as drums sent to drum reconditioners by a customer, are fungible commodities and are not individually tagged or tracked to ensure their return to that particular customer. Accordingly,

Request No. 22 purports to seek information that does not exist.

As stated in the RFI, "EPA is seeking to identify parties that have or may have contributed to contamination at the Site." Moreover, the RFI defined "COCs" as "any of the contaminants of concern at the Site and includes: lead, zinc, mercury, DDT, chlordane, dieldrin, and PCBs. Respondent further objects to Request No. 22 as it purports to seek information relating to hazardous substances beyond the specific chemicals for which EPA purports to have evidence of a release or threatened release to the environment at the Site and that is not relevant to the Site; thus, Respondent has limited its review of documents and information to the COCs identified by EPA. Additionally, Respondent objects to Request No. 22 as it purports to seek information regarding containers used to remove each type of waste containing any SOIs from the Facilities and taken to *any* other place during *any* time. To the extent that EPA seeks information about facilities that have no nexus with the BAD Site, this request is not relevant to the Site.

Notwithstanding the foregoing, and without any waiver of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

23. For each type of waste generated at the Facilities that contained any of the SOIs, describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling and identify all parties to each contract, agreement, or other arrangement described. State the ownership of waste containers as specified under each contract, agreement, or other arrangement described and the ultimate destination or use for such containers. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.

Response No. 23:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. As stated in the RFI, "EPA is seeking to identify parties that have or may have contributed to contamination at the Site." Moreover, the RFI defined "COCs" as "any of the contaminants of concern at the Site and includes: lead, zinc, mercury, DDT, chlordane, dieldrin, and PCBs. Respondent further objects to Request No. 23 as it purports to seek information relating to hazardous substances beyond the specific chemicals for which EPA purports to have evidence of a release or threatened release to the environment at the Site and that is not relevant to the Site; thus, Respondent has limited its review of documents and information to the COCs identified by EPA. Additionally, Respondent objects to Request No. 23 as it purports to seek information regarding waste generated at any Facilities that contained any SOIs and taken to *any* other place during *any* time. To the extent that EPA seeks information about facilities that have no nexus with the BAD Site, this request is not relevant to the Site. Notwithstanding the foregoing, and without any waiver of its objections, Respondent has located no information or

documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

24. Identify all individuals who currently have, and those who have had, responsibility for Respondent's environmental matters (including responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes and SHCs). Provide the job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning Respondent's waste management.

Response No. 24:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Identifying all individuals who currently have, and those who have had, responsibility for Respondent's environmental matters at all of Respondent's Facilities, including those that have no nexus to the BAD Site, is not feasible due to long history of existence/operations, and the number of Respondent's locations. Notwithstanding the foregoing and without waiving its objections, Respondent identifies Bill Boscacci (Oakland, CA), Lisa Mendoza (Tracy, CA), and Sandra Guzman (Vernon, CA) as the individuals who are currently responsible for environmental matters at the identified glass container manufacturing facilities in California. Mr. Boscacci and Ms. Mendoza both began working at the facilities mentioned above in 2002, and Ms. Guzman began working at the Vernon facility in 2008.

25. Did Respondent ever purchase drums or other containers from a drum recycler or drum reconditioner? If yes, identify the entities or individuals from which Respondent acquired such drums or containers.

Response No. 25:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. Identifying all drum recyclers or drum reconditioners from which Respondent has ever acquired such drums or containers is not feasible due to long history of Respondent's existence/operations and the number of Respondent's locations. Notwithstanding the foregoing, and without any waiver of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

26. Prior to 1988, did Respondent always keep its waste streams that contained SOIs separate from its other waste streams?

Response No. 26:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad,

and unduly burdensome. Respondent further objects to Request No. 26 as it purports to seek information relating to hazardous substances beyond the specific chemicals for which EPA purports to have evidence of a release or threatened release to the environment at the Site and that is not relevant to the Site; thus, Respondent has limited its review of documents and information to the COCs identified by EPA. Notwithstanding the foregoing and without waiving any of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

27. Identify all removal and remedial actions conducted pursuant to the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601 et seq., or comparable state law's all corrective actions conducted pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq.; and all cleanups conducted pursuant to the Toxic Substances Control Act, 15 § 2601 et seq. where (a) one of the COCs was addressed by the cleanup and (b) at which Respondent paid a portion of cleanup costs or performed work. Provide copies of all correspondence between Respondent and any federal or state government agency that (a) identifies a COC and (b) is related to one of the above-mentioned sites.

Response No. 27:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. As stated in the RFI, "EPA is seeking to identify parties that have or may have contributed to contamination at the Site." However, Request No. 27 purports to seek information regarding a broad range of removal and remedial actions, corrective actions and cleanups. Moreover, identifying all such removal and remedial actions is not feasible due to Respondent's long history of existence/operations, and the number of Respondent's locations. To the extent that EPA seeks information about facilities that have no nexus with the BAD Site, this request is not relevant to the Site. Respondent further objects to Request No. 27 to the extent that EPA is already in possession of the requested documents, and to the extent that EPA is not in possession of these files, they are readily available to EPA.

28. Provide all records of communication between Respondent and Bay Area Drum Company, Inc.; Meyers Drum Company; A.W. Sorich Bucket and Drum Company, Waymire Drum Company, Inc.; Waymire Drum and Barrel Company, Inc.; Bedini Barrels Inc.; Bedini Steel Drum Corp.; Bedini Drum; or any other person or entity that owned or operated the facility located as 1212 Thomas Avenue, in the City and County of San Francisco, California.

Response No. 28:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. DTSC conducted an extensive investigation of the BAD Site and Respondent's operations in connection with it. DTSC's files include

extensive records concerning the Bay Area Drum Company, Inc. and other persons and entities that owned or operated the facility located at 1212 Thomas Avenue, in the City and County of San Francisco, California. Respondent understands that EPA is already in possession of DTSC's files regarding the BAD Site, and to the extent that EPA is not in possession of these files, they are readily available to EPA. Notwithstanding the foregoing and without waiving any of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request other than the documents provided in Exhibits B and C.

29. Identify the time periods regarding which Respondent does not have any records regarding the SOIs that were produced, purchased, used, or stored at the Facilities.

Response No. 29:

In addition to the General Objections set forth above, Respondent objects to this request as overbroad in scope, unauthorized by law to the extent it is overbroad, and unduly burdensome. In responding to the RFI, Respondent has undertaken a diligent and good faith search for, and review of, documents and information in its possession, custody or control and that are relevant to this matter. Moreover, Respondent understands that EPA is already in possession of DTSC's files regarding the BAD Site. Respondent is under no further obligation to identify time periods to which these documents do not pertain, and Respondent has located no information or documents within its custody or control that may be responsive to this request other than the information provided in response to Request Nos. 2, 3, 4 and 5.

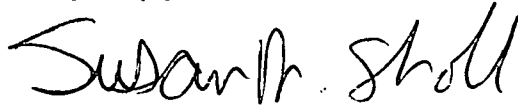
30. Provide copies of all documents containing information responsive to the previous twenty-nine questions and identify the questions to which each document is responsive.

Response No. 30:

Respondent objects to Request No. 30 as it purports to seek information relating to hazardous substances beyond the specific chemicals for which EPA purports to have evidence of a release or threatened release to the environment at the Site and that is not relevant to the Site; thus, Respondent has limited its review of documents and information to the COCs identified by EPA. Respondent further objects to Request No. 30 as it purports to seek copies of documents containing information responsive to the previous twenty-nine questions. DTSC conducted an extensive investigation of the BAD Site and Respondent's operations in connection with it. DTSC's investigation included an information request to Respondent and the DTSC files include Respondent's Response to DTSC's information request, among other documents. We understand that EPA is already in possession of DTSC's files regarding the BAD Site, and to the extent that EPA is not in possession of these files, they are readily available to EPA. Notwithstanding the foregoing and without waiving any of its objections, Respondent has located no information or documents within its custody or control that may be responsive to this request other than the documents provided in Exhibits B and C.

Any questions EPA may have regarding the responses to this information request may be directed to me at 567-336-8831.

Very truly yours,

A handwritten signature in black ink that reads "Susan M. Sholl". The signature is written in a cursive, flowing style.

Susan M. Sholl, P.E.
Owens-Illinois, Inc.
One Michael Owens Way – Plaza 3
Perrysburg, Ohio 43551-2999

EXHIBIT A

October 15, 2009 and August 24, 2010
Requests For Information

OCT 19 2009



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Sent via Federal Express

October 15, 2009

Albert P.L. Stroucken, Chairman, President and CEO
Owens-Illinois, Inc.
One Michael Owens Way
Perrysburg, OH 43551

Susan Smith, Counsel
Owens-Illinois, Inc.
Three O-I Plaza
One Michael Owens Way
Perrysburg, OH 43551-2999

URGENT LEGAL MATTER

**Re: Request for Information Pursuant to Section 104(e) of CERCLA for the
Yosemite Creek Superfund Site
San Francisco, California
Liable Company Name: Owens-Illinois, Inc.
Generator Name: Owen Illinois (Brockway Glass)**

Dear Albert P.L. Stroucken:

The United States Environmental Protection Agency ("EPA") is spending public funds to investigate and respond to the release or threatened release of hazardous substances at the Yosemite Creek Superfund Site located in San Francisco, California (the "Site"). As part of its investigation EPA is seeking to identify parties that have or may have contributed to contamination at the Site.

EPA is conducting an investigation to identify information relevant to the response action and believes that you may be in possession of information that is relevant to this investigation. As part of this investigation and pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e), EPA requires that you or your authorized representative answer the questions provided in Enclosure B and provide copies of all documents requested. Under federal law, EPA may require:

[A]ny person who has or may have information relevant to any of the following to furnish, upon reasonable notice, information or documents relating to such matter:

- (A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility.
- (B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.
- (C) Information relating to the ability of a person to pay for or perform a cleanup.

Please note that compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in an enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. § 9604(e)(5), or other legal authorities. In addition, Section 104(e)(2), as adjusted by the Debt Collection Improvement Act of 1996, authorizes EPA to seek the imposition of penalties of up to **\$37,500 per day** for noncompliance with this Information Request. Please be further advised that providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

A legally defensible business confidentiality claim covering all or part of the information requested in this letter may be asserted as provided in 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. EPA will construe the failure to furnish a confidentiality claim, as a waiver of any claim, and may make the information available to the public without further notice. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §§ 3501, *et seq.*

Pursuant to 40 C.F.R. § 2.310(h), Disclosure to Authorized Representatives, you are given notice of the contemplated disclosures by EPA of the information provided in response to this Information Request to authorized representatives of EPA. EPA's authorized representatives include GRB Environmental Services Inc. and Science Applications International Corporation. Any subsequent additions or changes in EPA contractors who may have access to your responses will be published in the Federal Register. This information may be made available to these authorized representatives of EPA for any of the following reasons: to assist with document handling, analysis, inventory and indexing. Pursuant to 40 C.F.R. § 2.310(h), you may submit comments regarding EPA's disclosure of any confidential information contained in your response to EPA's authorized representatives with ten (10) days of receipt of this request.

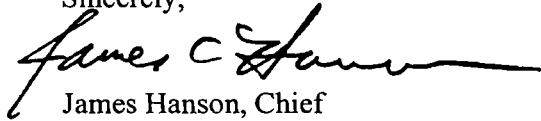
Because of the legal ramifications regarding this request, EPA strongly encourages you to give this matter your immediate attention. Responses to this Request for Information must be made in writing, signed by a duly authorized representative, and submitted to EPA within thirty (30) calendar days of the date of this letter. Your responses should be directed to:

Craig Whitenack, Civil Investigator
United States Environmental Protection Agency
Region IX, Southern California Field Office
600 Wilshire Avenue, Suite 1420
Los Angeles, California 90017

If you need further information, EPA has established a toll-free number specific to the Yosemite Creek Site. Please call (888) 868-4563 with any questions or concerns and EPA will respond to your call in a timely manner. Thank you for your attention to this matter.

Thank you for your attention and cooperation regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "James C. Hanson", with a long horizontal flourish extending to the right.

James Hanson, Chief
Enforcement & Removal Operations Section
Superfund Division

Enclosures: Enclosure A, Instructions and Definitions
Enclosure B, Information Request Questions

ENCLOSURE A

INFORMATION REQUEST INSTRUCTIONS

1. Provide a separate narrative response to each and every question and Subpart of a question set forth in this Information Request. Information must be provided to EPA whether or not such information is contained in available documents.
2. Precede each answer with the number of the question to which it corresponds. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.
3. Where any person covered by this request has information that has not been memorialized in any document, but is nonetheless responsive to a question, you must nonetheless provide such information in response to this request.
4. For each and every question contained in this letter, if information responsive to this Information Request is not in your possession, custody or control, then identify the persons from whom such information may be obtained. For each individual, provide the following: name, last known or current address, telephone number, and affiliation with your company or the Site.
5. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after submission of its response, that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response.
6. The scope of this request includes all information and documents independently developed or obtained by research on the part of your company, its attorneys, consultants or any of their agents, consultants or employees.
7. To the extent that there are any documents that are responsive to this Information Request that you are withholding for any reason, you should identify the document and state your basis for withholding the document. To the extent that you do not respond to any request, describe your basis for withholding the information.

INFORMATION REQUEST DEFINITIONS

The following definitions shall apply to the words appearing in this Information Request.

1. The term "BAD Site" means the property known as the former Bay Area Drum facility, located at 1212 Thomas Avenue in San Francisco, California where Bay Area Drum Company, Inc. and successive operators conducted container cleaning and reconditioning operations.
2. The term "COCs" means any of the contaminants of concern at the Site and includes: lead, zinc, mercury, dichlorodiphenyltrichloroethane ("DDT"), chlordane, dieldrin, and polychlorinated biphenyls ("PCBs").
3. The term "document" or "documents" includes any written, recorded, computer generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.
4. The term "Facility" or "Facilities" means any facility owned or operated by you from 1940 to 1988 to include any facility owned or operated by you during this time period but no longer owned or operated by you and any facility operating during this time period that you currently own or operate.
5. The term "hazardous material" means all hazardous substances, pollutants or contaminants, as defined above.
6. The term "hazardous substance" has the same definition as Section 101(14) of CERCLA and includes any mixtures of hazardous substances with other substances, including petroleum products.
7. The term "identify" means, with respect to an individual person, the person's name, business address, business telephone number, home address, and person's title, position, or business.
8. The term "identify" means, with respect to a corporation, partnership, business trust, other association or business entity (including sole proprietorship) the full name, address, legal form of organization (e.g. corporation, partnership, etc.), if any, and a brief description of the business.
9. The term "identify" means, with respect to a document, its normal business description, its date, its number, any (invoice or purchase order number), the identity of the author, addressee, addressee or recipient, and substance or the subject matter.
10. The term "Materials" means all COCs, SOIs, hazardous substances, pollutants and contaminants, hazardous wastes, and solid wastes, as defined in this Enclosure.
11. The term "person" has the same definition as Section 101(21) of CERCLA: an individual, firm, corporation, association, partnership, consortium, joint venture, commercial

entity, United States Government, State, municipality, commission, political subdivision of a State or any interstate body.

12. The term "pollutant" or "contaminant" has the same definition as Section 101(33) of CERCLA, and includes any mixtures of pollutants and contaminants with any other substances. Petroleum products mixed with pollutants and contaminants are also included.

13. The term "release" has the same definition as Section 101(22) of CERCLA, 42 U.S.C. 9601(22), and includes any spilling, leaking, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substances or pollutant or contaminant.

14. The terms "Respondent" or "you" or "the company" or "your" or "your company" refer not only to the addressee of this letter as it is currently named and constituted, but also to all predecessors and successors in interest of the addressee, and all subsidiaries, divisions, affiliates, and branches of the addressee and its predecessors and successors.

15. The term "store" or "storage" means to have present at a Facility at any time and for any purpose.

16. The term "Substance of Interest" or "SOI" means all COCs, hydraulic oils, and transformer oils.

17. The terms "and" and "or" shall be construed either disjunctively or conjunctively to bring within the scope of this Information Request any information which might be construed to be outside its scope.

18. Words in the masculine shall be construed in the feminine, and vice versa and words in the singular shall be construed in the plural, and vice versa, to bring within the scope of this Information Request any information that might be construed to outside the scope.

19. All terms not defined have their ordinary meaning unless such terms are defined in CERCLA, in which case the statutory definitions shall apply.

20. The terms "you" or "your" shall reference to you and each and every authorized representative responding to this Information Request.

ENCLOSURE B

INFORMATION REQUEST QUESTIONS

1. Describe generally the nature of the business conducted by Respondent and identify the products manufactured, formulated, or prepared by Respondent throughout its history of operations.
2. Provide the name (or other identifier) and address of any facilities where Respondent carried out operations between 1940 and 1988 (the "Relevant Time Period") and that:
 - a. ever shipped drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal, or sale.
 - b. are/were located in California (excluding locations where ONLY clerical/office work was performed);
 - c. are/were located outside of California and shipped any drums or other containers to California for recycling, cleaning, reuse, disposal, or sale (for drums and containers that were shipped to California for sale, include in your response only transactions where the drums and containers themselves were an object of the sale, not transactions where the sole object of the sale was useful product contained in a drum or other container).
3. Provide a brief description of the nature of Respondent's operations at each Facility identified in your response to Question 2 (the "Facilities") including:
 - a. the date such operations commenced and concluded; and
 - b. the types of work performed at each location over time, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.
4. For each Facility, describe the types of records regarding the storage, production, purchasing, and use of Substances of Interest ("SOI") during the Relevant Time Period that still exist and the periods of time covered by each type of record.
5. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use, or store one of the COCs (including any substances or wastes containing the COCs) at any of the Facilities? State the factual basis for your response.
6. If the answer to Question 5 is yes, identify each COC produced, purchased, used, or stored at each Facility.
7. If the answer to Question 5 is yes, identify the time period during which each COC was produced, purchased, used, or stored at each Facility.
8. If the answer to Question 5 is yes, identify the average annual quantity of each COC produced, purchased, used, or stored at each Facility.

9. If the answer to Question 5 is yes, identify the volume of each COC disposed by the Facility annually and describe the method and location of disposal.
10. Did Respondent ever (not just during the Relevant Time Period) produce, purchase, use, or store hydraulic oil or transformer oil at any of the Facilities? State the factual basis for your response to this question.
11. If the answer to Question 10 is yes, identify each specific type of hydraulic oil and transformer oil produced, purchased, used, or stored at each Facility.
12. If the answer to Question 10 is yes, identify the time period during which each type of hydraulic oil and transformer oil was produced, purchased, used, or stored.
13. If the answer to Question 10 is yes, identify the average annual quantity of each type hydraulic oil and transformer oil purchased, produced, used, or stored at each Facility.
14. If the answer to Question 10 is yes, identify the volume of each hydraulic oil and transformer oil disposed by the Facility annually and describe the method and location of disposal.
15. Provide the following information for each SOI (SOIs include any substance or waste containing the SOI) identified in your responses to Questions 5 and 10:
 - a. Describe briefly the purpose for which each SOI was used at the Facility. If there was more than one use, describe each use and the time period for each use;
 - b. Identify the supplier(s) of the SOIs and the time period during which they supplied the SOIs, and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks and other documents pertaining to the procurement of the SOI;
 - c. State whether the SOIs were delivered to the Facility in bulk or in closed containers, and describe any changes in the method of delivery over time;
 - d. Describe how, where, when, and by whom the containers used to store the SOIs (or in which the SOIs were purchased) were cleaned, removed from the Facility, and/or disposed of, and describe any changes in cleaning, removal, or disposal practices over time.
16. For each SOI delivered to the Facilities in closed containers, describe the containers, including but not limited to:
 - a. the type of container (e.g. 55 gal. drum, tote, etc.);
 - b. whether the containers were new or used; and
 - c. if the containers were used, a description of the prior use of the container.
17. For each container that Respondent used to store a SOI or in which SOIs were purchased ("Substance-Holding Containers" or "SHCs") that was later removed from the Facility, provide a complete description of where the SHCs were sent and the circumstances under which the SHCs were removed from the Facility. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.
18. For each SHC that was removed from the Facility, describe Respondent's contracts, agreements, or other arrangements under which SHCs were removed

from the Facility, and identity all parties to each contract, agreement, or other arrangement described. Distinguish between the Relevant Time Period and the time period since 1988.

19. For each SHC, provide a complete explanation regarding the ownership of the SHC prior to delivery, while onsite, and after it was removed from the Facility. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.
20. Identify all individuals who currently have, and those who have had, responsibility for procurement of Materials at the Facilities. Also provide each individual's job title, duties, dates performing those duties, current position or the date of the individual's resignation, and the nature of the information possessed by each individual concerning Respondent's procurement of Materials.
21. Describe how each type of waste containing any SOIs was collected and stored at the Facilities prior to disposal/recycling/sale/transport, including:
 - a. the type of container in which each type of waste was placed/stored;
 - b. how frequently each type of waste was removed from the Facility;Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.
22. Describe the containers used to remove each type of waste containing any SOIs from the Facilities, including but not limited to:
 - a. the type of container (e.g. 55 gal. drum, dumpster, etc.);
 - b. the colors of the containers;
 - c. any distinctive stripes or other markings on those containers;
 - d. any labels or writing on those containers (including the content of those labels);
 - e. whether those containers were new or used; and
 - f. if those containers were used, a description of the prior use of the container;Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.
23. For each type of waste generated at the Facilities that contained any of the SOIs, describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling and identify all parties to each contract, agreement, or other arrangement described. State the ownership of waste containers as specified under each contract, agreement, or other arrangement described and the ultimate destination or use for such containers. Distinguish between the Relevant Time Period and the time period since 1988, and describe any changes in Respondent's practices over time.
24. Identify all individuals who currently have, and those who have had, responsibility for Respondent's environmental matters (including responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes and SHCs). Provide the job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the

nature of the information possessed by such individuals concerning Respondent's waste management.

25. Did Respondent ever purchase drums or other containers from a drum recycler or drum reconditioner? If yes, identify the entities or individuals from which Respondent acquired such drums or containers.
26. Prior to 1988, did Respondent always keep its waste streams that contained SOIs separate from its other waste streams?
27. Identify all removal and remedial actions conducted pursuant to the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601 et seq., or comparable state law; all corrective actions conducted pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq.; and all cleanups conducted pursuant to the Toxic Substances Control Act, 15 U.S.C. § 2601 et seq. where (a) one of the COCs was addressed by the cleanup and (b) at which Respondent paid a portion of cleanup costs or performed work. Provide copies of all correspondence between Respondent and any federal or state government agency that (a) identifies a COC and (b) is related to one of the above-mentioned sites.
28. Provide all records of communication between Respondent and Bay Area Drum Company, Inc.; Meyers Drum Company; A.W. Sorich Bucket and Drum Company; Waymire Drum Company, Inc.; Waymire Drum and Barrel Company, Inc.; Bedini Barrels Inc.; Bedini Steel Drum Corp.; Bedini Drum; or any other person or entity that owned or operated the facility located at 1212 Thomas Avenue, in the City and County of San Francisco, California.
29. Identify the time periods regarding which Respondent does not have any records regarding the SOIs that were produced, purchased, used, or stored at the Facilities.
30. Provide copies of all documents containing information responsive to the previous twenty-nine questions and identify the questions to which each document is responsive.

AUG 25 2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Sent Via FedEx

August 24, 2010

Susan Smith
Counsel
for Owens-Illinois, Inc.
Three O-I Plaza
One Michael Owens Way
Perrysburg, OH 43551-2999

Re: United States Environmental Protection Agency, Region IX
Follow Up Request for Information Pursuant to 42 U.S.C. § 9604(e)
Pertaining to the Yosemite Creek Superfund Removal Site
San Francisco, California
Liable Company Name: Owens-Illinois, Inc.
Generator Company Name: Owen Illinois (Brockway Glass)

Dear Susan Smith:

The United States Environmental Protection Agency ("EPA") has received and reviewed Owens-Illinois, Inc.'s response to EPA's October 15, 2009 Request for Information ("Request") relating to the Yosemite Creek Superfund Removal Site ("Site") in San Francisco.

EPA acknowledges the information Owens-Illinois, Inc. has provided to date, but notes that Owens-Illinois, Inc. has provided non-responsive or only partially responsive answers to certain questions in the Request.

EPA considers your lack of responsiveness to be a failure and/or refusal to comply with the Request. As stated in the Request, failure to respond subjects you to penalties up to \$37,500 per day of violation. EPA may seek to recover penalties at the time any liability you have at the Site is resolved or it may separately refer the matter to the United States Department of Justice for judicial action.

EPA strongly encourages you to submit your written response as soon as possible. Please direct your response to:

Craig Whitenack, Civil Investigator
United States Environmental Protection Agency
Region IX, Southern California Field Office
600 Wilshire Blvd., Suite 1460
Los Angeles, California 90017

If you have any legal questions regarding this matter, please contact Michael Massey at (415) 972-3034 in our Office of Regional Counsel.

Sincerely,

A handwritten signature in black ink, appearing to read "James C. Hanson", with a long horizontal flourish extending to the right.

James Hanson, Chief
Enforcement & Removal Operations Section
Superfund Division

cc: Nicholas W. van Aelstyn

EXHIBIT B

Owens-Illinois, Inc.'s October 29, 1992 Response to California Environmental Protection Agency, Department of Toxic Substances Control's Request for Information regarding the Bay Area Drum Site.

and

Myers Drum Company Receipts

Owens-Illinois, Inc.'s October 29, 1992 Response to California Environmental Protection Agency, Department of Toxic Substances Control's Request for Information regarding the Bay Area Drum Site.

October 29, 1992

Ms. Monica Gan
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, California 94710-2737

RE: Bay Area Drum Site

Dear Ms. Gan:

The following is submitted in response to the California Environmental Protection Agency, Department of Toxic Substances Control's ("DEPARTMENT") request for information, dated August 31, 1992, relating to Owens-Illinois, Inc.'s ("RESPONDENT") connection to the Bay Area Drum site ("SITE") between the years 1948 to 1987.

RESPONDENT objects to the following requests on the grounds that they are overly broad insofar as the SITE ceased operations in 1987. Based on the foregoing, the following response is limited to the information in RESPONDENT'S possession in this pertinent time frame from 1948 through 1987.

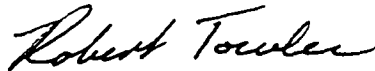
After a thorough and diligent investigation, RESPONDENT was unable to discover any additional information, other than the information forwarded to RESPONDENT by the DEPARTMENT, enabling it to specifically respond to each of the requests propounded by the DEPARTMENT. The only information connecting RESPONDENT to the SITE are the documents forwarded to RESPONDENT by the Department of Toxic Substances Control (Attached to this Response). These documents seem to suggest that RESPONDENT'S only connection to the SITE are the two (2) isolated transactions with the Waymire Drum Co., Inc. in 1978 and 1979.

The documents representing these transactions, however, do not reveal whether RESPONDENT sent drums to the SITE or other types of materials such as wooden pallets. Nor do the documents reveal that if drums were actually sent to the SITE, whether the drums were empty or were filled with hazardous substances. Apart from revealing the date, the check number and the cost of the transactions, the Waymire documents do not reveal any other information. Therefore, RESPONDENT objects to any characterization of these transactions apart from what is revealed from the face of the documents.

Ms. Monica Gan
Bay Area Drum Site
October 29, 1992
Page 3

The above consists of all the information in RESPONDENT'S possession resulting from a thorough and diligent investigation with respect to the SITE. For the foregoing reason, RESPONDENT has not provided an individual response to each request propounded. RESPONDENT will supplement this response as necessary. If you have any further questions or comments, do not hesitate to contact the undersigned.

Very truly yours,

A handwritten signature in cursive script, reading "Robert Towles".

Robert Towles
Manager, Environmental Affairs

RJT:cg

12-15-78

WAYMIRE DRUM CO., INC.
CHECK REGISTER CONTROL
WEEK ENDING

Prepared by	Initials	D
Approved by		

Pay to the Order of	Date	Check Number	Amount	(Account Number) (Receiving Ticket & etc.)	Description
Carl Miller	12-11	1061	Confidential	#1031	
Wmnd Art-tine	12-11	1062		#1073	
Hidden Paint	12-11	1064		#1084	
J.W.U.	12-11	1070			
Carl Miller	12-12	1071		#1083	
Wmnd Art-tine	12-12	1072		#1083	
Wmnd & Art-tine	12-12	1073		#1081	
Wmnd Art-tine	12-12	1074		#1082	
Wmnd Art-tine	12-12	1075			
Wmnd Art-tine	12-13	1076			
Wmnd Art-tine	12-13	1077		#987	
Wmnd Art-tine	12-13	1078		#986	
Chicago Fick Co	12-13	1079		#985	
K. Jackson	12-13	1080		#1038	
Wmnd Art-tine	12-14	1081		#988	
Wmnd Art-tine	12-14	1082		#1081	
K. Jackson	12-14	1083		#1039	
Wmnd Art-tine	12-15	1084		#992	
Wmnd Art-tine	12-15	1085		#1030	
Wmnd Art-tine	12-15	1086		#1044	
Wmnd Art-tine	12-15	1087		#1046	

2-16-79

Prepared by	Initials
Approved by	

WAYMIRE DRUM CO., INC.
CHECK REGISTER CONTROL
WEEK ENDING

		1	2	3	4	5	6
Pay to the	Date	Check	Amount	(Account Number) (Receiving Ticket # etc.)			Description
Order of		Number					
Hermon Smith	2-12	1243	Confidential				T&G # 1151
Thomas Freeman	2-12	1244					T&G # 1152
Ray Carroll Texaco	2-12	1245					RV - Brake Adjustment
Wm. L. Loe	2-12	1246					Paint
Whitfield Products	2-12	1247					T&G # 941
Wm. W. Jones	2-13	1248					Receipts & 4 Casino
Edward L. Loe	2-14	1249					T&G # 1153
Wm. L. Loe	2-14	1250					T&G # 1027
Earl Miller	2-14	1251					T&G # 1154
Edward Brown	2-14	1252					T&G # 1155
Hermon Smith	2-15	1253					T&G # 1159
Wm. L. Loe	2-15	1254					Freight
Wm. L. Loe	2-16	1255					T&G # 1160
Edward Loe	2-16	1256					
Phil Medina	2-16	1257					
Wm. L. Loe	2-16	1258					Petty Cash Receipt
Edward Loe	2-16	1259					

Myers Drum Company Receipts

MISCELLANEOUS SALES & RETURN ORDER

M. S. R. O. Number

010100



Owens-Illinois

Ship To

Myers Lumber Co
6549 Ingham Ave
Oakland, Ca 94608

Please refer to "Our No." in any correspondence covering this billing.

Our No.

NA

Account No.

Your No.

Terms

Date

F.O.B.

B/L No.

Shipped From

Vis

14700 West Schulte Rd.
Tracy, Ca. 95376

Date Shipped

2-29-88

DESCRIPTION

QUANTITY
SHIPPED

UNIT PRICE

Used Drums

NA

Our Purchase Order NA applies. Any problems call (209)835-5701

By

[Signature]

PURCHASING

Waste Drums
to Myers a
recycling firm.

Myers Drum Company

6549 San Pablo Avenue • Oakland, Calif. 94608

PHONE: OLympic 2-6847

Date _____

Received From

Quinn J. Minnis

Address _____

City

Tracy

Purchased

Inventory

QUANTITY

55 GAL. #1 OIL TOP BUNG

55 GAL. #2 OIL TOP BUNG

55 GAL. OIL SIDE BUNG

55 GAL. #3 OIL

35 55 GAL. OIL DEHEADERS

55 GAL. OIL AGITATORS

83 55 GAL. 20/18 GA. OIL

55 GAL. LINERS

55 GAL. #1 QUIK LOX

2 55 GAL. #2 QUIK LOX

55 GAL. QL BOLT RING

55 GAL. 17 H

30 GAL. OIL

30 GAL. QUIK LOX

15 GAL. OIL

Car Number

D 05741

"If the above items are commingled, like items of similar quality will be returned."

Per

B. L. L. L.

EXHIBIT C

Section 103(c) Filings

X

SUPERFUND QUESTIONNAIRE (SECTION 103(c))
POTENTIAL HAZARDOUS WASTE SITE SURVEY - APRIL 28, 1981

Facility Name Owens-Illinois, Inc.Facility Location 2923 Fruitland Avenue, Vernon, CaliforniaPerson Reporting Robert Strassenburg Phone No. (213) 587-3281Waste Type P.C.B - (Polychlorinated Biphenyls)
(See Table I & II)

Note: If more than one type, duplicate Form A and report each separately.

Dates of Waste Handling From Year 1978 To present
(Enter the years you estimate the waste was handled at the site)Waste Quantity (Specify Tons, Gallons or other) 7,521 Kilograms

Waste Facility Type (See Attachment A for examples)

Pile _____	Tank _____
Pond or Lagoon _____	Drums _____
Landfill _____	Land Treatment _____
Underground Injection _____	Other (Specify) <u>Storage Vault</u>

Total Waste Facility Area *288 ☐ Acres
(Estimate size occupied by waste area)
*10" perimeter dike with 10" thick wall ☒ Square Feet

Waste Site Ownership

- ☐ Present O-I Property
- ☐ Previous O-I Property
- ☐ Off Property Site - Transported to and Selected by O-I

Attach a sketch or other data on the waste site, if available.

RETURN BY MAY 15, 1981 - to B. E. Wiens - NTC-1

FORM A

SUPERFUND QUESTIONNAIRE (SECTION 103(c))
POTENTIAL HAZARDOUS WASTE SITE SURVEY - APRIL 28, 1981

since { Facility Name BKK Corp.
Facility Location 2210 So. Azusa Avenue, West Covina, California

Person Reporting George Lemire Phone No. 587-3281

Waste Type #8 Air pollution control device catch (Precipitators)
(See Table I & II)

Note: If more than one type, duplicate Form A and report each separately.

Dates of Waste Handling From Year 1975 To present
(Enter the years you estimate the waste was handled at the site)

Waste Quantity (Specify Tons, Gallons or other) 80 tons

Waste Facility Type (See Attachment A for examples)

Pile _____	Tank _____
Pond or Lagoon _____	Drums _____
Landfill <u>Private</u>	Land Treatment _____
Underground Injection _____	Other (Specify) _____

Total Waste Facility Area 4000
(Estimate size occupied by waste area)

☐ Acres

☐ Square Feet

☒ Cubic feet

Waste Site Ownership *?*

☐ Present O-I Property

☐ Previous O-I Property

☒ Off Property Site - Transported
to and Selected by O-I.

prior to

Attach a sketch or other data on the waste site, if available.

RETURN BY MAY 15, 1981 - to B. E. Wiens - NTC-1

SUPERFUND QUESTIONNAIRE (SECTION 103(c))
POTENTIAL HAZARDOUS WASTE SITE SURVEY - APRIL 28, 1981Facility Name BKK Corp.Facility Location 2210 So. Azusa Avenue West Covina, CaliforniaPerson Reporting George Lemire Phone No. 587-3281Waste Type #6 Chromium furnace refractory
(See Table I & II)

Note: If more than one type, duplicate Form A and report each separately.

Dates of Waste Handling *From 4-11-1981 To 4-13-81
(Enter the years you estimate the waste was handled at the site)Waste Quantity (Specify Tons, Gallons or other) 15 tons

Waste Facility Type (See Attachment A for examples)

Pile _____ Tank _____

Pond or Lagoon _____ Drums _____

Landfill Private Land Treatment _____

Underground Injection _____ Other (Specify) _____

Total Waste Facility Area 1000 Cu.Ft.
(Estimate size occupied by waste area)☐ Acres☐ Square FeetWaste Site Ownership ☒BKK☐ Present O-I Property☐ Previous O-I Property☒ Off Property Site - Transported
to and Selected by O-I

Attach a sketch or other data on the waste site, if available.

* prior to 4-11-81 not sure where refractory was dumped. outside Contracted

RETURN BY MAY 15, 1981 - to B. E. Wiens - NTC-1

SUPERFUND QUESTIONNAIRE (SECTION 103(c))
POTENTIAL HAZARDOUS WASTE SITE SURVEY - APRIL 28, 1981Facility Name J. C. IncorporatedFacility Location 2221 Loma Street So. El Monté, CaliforniaPerson Reporting George Lemire Phone No. 587-3281Waste Type #9 and #10 paint and caustic soda
(See Table I & II) *consider hazardous?*

Note: If more than one type, duplicate Form A and report each separately.

* Dates of Waste Handling From Year 1976 To Year 1979
(Enter the years you estimate the waste was handled at the site)

Waste Quantity (Specify Tons, Gallons or other) _____

Waste Facility Type (See Attachment A for examples)

Pile _____ Tank _____

Pond or Lagoon _____ Drums 550

Landfill _____ Land Treatment _____

Underground Injection _____ Other (Specify) _____

Total Waste Facility Area ?
(Estimate size occupied by waste area)☐ Acres☐ Square Feet

Waste Site Ownership

☐ Present O-I Property*We have not used any
above material since 1979☐ Previous O-I Property☒ Off Property Site - Transported
to and Selected by O-I

Attach a sketch or other data on the waste site, if available.

RETURN BY MAY 15, 1981 - to B. E. Wiens - NTC-1

FORM A

SUPERFUND QUESTIONNAIRE (SECTION 103(c))
POTENTIAL HAZARDOUS WASTE SITE SURVEY - APRIL 28, 1981

*No Report
made*

Facility Name MISSION VIEJO SAND PLANT ^{SF}

Facility Location 31302 Ortega Highway, San Juan Capistrano, Ca. 92675

Person Reporting D. G. Hendrickson Phone No. (714) 493-4571

Waste Type None
(See Table I & II)

Note: If more than one type, duplicate Form A and report each separately.

Dates of Waste Handling From _____ To _____
(Enter the years you estimate the waste was handled at the site)

Waste Quantity (Specify Tons, Gallons or other) _____

Waste Facility Type (See Attachment A for examples)

Pile _____	Tank _____
Pond or Lagoon _____	Drums _____
Landfill _____	Land Treatment _____
Underground Injection _____	Other (Specify) _____

Total Waste Facility Area _____
(Estimate size occupied by waste area)

☐ Acres

☐ Square Feet

Waste Site Ownership

- ☐ Present O-I Property
☐ Previous O-I Property
☐ Off Property Site - Transported to and Selected by O-I.

Attach a sketch or other data on the waste site, if available.

RETURN BY MAY 15, 1981 - to B. E. Wiens - NTC-1

~~no filing~~

SUPERFUND QUESTIONNAIRE (SECTION 103(c))
POTENTIAL HAZARDOUS WASTE SITE SURVEY - APRIL 28, 1981

Facility Name OWENS-ILLINOIS, INC.
GLASS CONTAINER DIVISION
Facility Location 3600 Alameda Avenue
Oakland, Ca. 94604
Person Reporting S. W. SORENSEN Phone No. (415) 436-2056

Waste Type All waste has been hauled by local scavengers, therefore,
(See Table I & II) none of the following applies.

Note: If more than one type, duplicate Form A and report each separately.

Dates of Waste Handling From _____ To _____
(Enter the years you estimate
the waste was handled at the site)

Waste Quantity (Specify Tons, Gallons or other) _____

Waste Facility Type (See Attachment A for examples)

Pile _____ Tank _____
Pond or Lagoon _____ Drums _____
Landfill _____ Land Treatment _____
Underground Injection _____ Other (Specify) _____

Total Waste Facility Area _____
(Estimate size occupied by waste area)

☐ Acres

☐ Square Feet

Waste Site Ownership

- ☐ Present O-I Property
☐ Previous O-I Property
☐ Off Property Site - Transported
to and Selected by O-I.

Attach a sketch or other data on the waste site, if available.

RETURN BY MAY 15, 1981 - to B. E. Wiens - NTC-1

no filing

X

T
R

SUPERFUND QUESTIONNAIRE (SECTION 103(c))
POTENTIAL HAZARDOUS WASTE SITE SURVEY - APRIL 28, 1981

Facility Name OWENS-ILLINOIS, INC.Facility Location TRACY G.C. PLANT #22, TRACY, CALIFORNIA.Person Reporting E. VALIS Phone No. 209 835-5701 EXT 212Waste Type VARIOUS RCRA WASTES
(See Table I & II)

Note: If more than one type, duplicate Form A and report each separately.

Dates of Waste Handling From NOV, 1980 To PRESENT.
(Enter the years you estimate the waste was handled at the site)Waste Quantity (Specify Tons, Gallons or other) VARIES + VARIOUS

Waste Facility Type (See Attachment A for examples)

Pile _____ Tank _____

Pond or Lagoon _____ Drums _____

Landfill _____ Land Treatment _____

Underground Injection _____ Other (Specify) RCRA TEMPORARY STORAGE AREATotal Waste Facility Area 60' x 35'
(Estimate size occupied by waste area)☐ Acres☐ Square Feet

Waste Site Ownership

☒ Present O-I Property☐ Previous O-I Property☐ Off Property Site - Transported
to and Selected by O-I.

Attach a sketch or other data on the waste site, if available.

RETURN BY MAY 15, 1981 - to B. E. Wiens - NTC-1

SUPERFUND QUESTIONNAIRE (SECTION 103(c))
POTENTIAL HAZARDOUS WASTE SITE SURVEY - APRIL 28, 1981Facility Name OWENS - ILLINOIS, INC.Facility Location TRACY G.C. PLANT #22, TRACY, CALIFORNIA.Person Reporting E. VALIS Phone No. 209 835-5701 EXT 212Waste Type CHROMIUM

(See Table I & II)

Note: If more than one type, duplicate Form A and report each separately.

Dates of Waste Handling From 1978 To 1980
(Enter the years you estimate the waste was handled at the site)Waste Quantity (Specify Tons, Gallons or other) 1 MILLION GALLONS OF WATER @ 32 p.p.m.

Waste Facility Type (See Attachment A for examples)

Pile _____

Tank _____

Pond or Lagoon X

Drums _____

Landfill _____

Land Treatment _____

Underground Injection _____

Other (Specify) _____

*unlikely
concentration
to pond water
5ppm consider
dilution*Total Waste Facility Area 60' x 120' pond
(Estimate size occupied by waste area)☐ Acres☐ Square Feet

Waste Site Ownership



Present O-I Property



Previous O-I Property

Off Property Site - Transported
to and Selected by O-I.

Attach a sketch or other data on the waste site, if available.

RETURN BY MAY 15, 1981 - to B. E. Wiens - NTC-1

SUPERFUND QUESTIONNAIRE (SECTION 103(c))
POTENTIAL HAZARDOUS WASTE SITE SURVEY - APRIL 28, 1981Facility Name OWENS - ILLINOIS, INC.Facility Location TRACY G.C. PLANT #22, TRACY, CALIFORNIA.Person Reporting E. VALIS Phone No. 209 835-5701 EXT 212Waste Type CULLET SUMP SLUDGE (OILY WASTE)
(See Table I & II)

Note: If more than one type, duplicate Form A and report each separately.

Dates of Waste Handling ONE OCCASION - DEC, 1979
(Enter the years you estimate the waste was handled at the site)
From To Waste Quantity (Specify Tons, Gallons or other) 2 cubic yards

Waste Facility Type (See Attachment A for examples)

Pile X Tank Pond or Lagoon Drums Landfill Land Treatment Underground Injection Other (Specify) Total Waste Facility Area 10' x 20'
(Estimate size occupied by waste area)☐ Acres☐ Square Feet

Waste Site Ownership

☒ Present O-I Property☐ Previous O-I Property☐ Off Property Site - Transported
to and Selected by O-I.

Attach a sketch or other data on the waste site, if available.

RETURN BY MAY 15, 1981 - to B. E. Wiens - NTC-1

Waste Quantity:

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1. ☐ Piles
2. ☐ Land Treatment
3. ☒ Landfill
4. ☐ Tanks
5. ☐ Impoundment
6. ☐ Underground Injection
7. ☐ Drums, Above Ground
8. ☐ Drums, Below Ground
9. ☐ Other (Specify) _____

Total Facility Waste Amount:

cubic feet Indeterminable

gallons

Total Facility Area

square feet

acres Unknown

Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☐ Likely ☒ None Known

Note: Items Hand I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

*To the best of our knowledge we are unaware of any releases of waste from the site.

Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional.

Name

Owens-Illinois, Inc.

Street

200 Old Ranch Road

City

City of Industry

State

CAL

Zip Code

91789

☒ Owner, Pres.

☐ Owner, Pas.

☐ Transporter

☐ Operator, P.

☐ Operator, P.